

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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TRUSTEES OF THE LAUNDRY, DRY CLEANING
WORKERS AND ALLIED INDUSTRIES HEALTH
FUND, UNITE HERE!; and TRUSTEES OF THE
LAUNDRY, DRY CLEANING WORKERS AND
ALLIED INDUSTRIES RETIREMENT FUND,
UNITE HERE!

Plaintiffs,

- against -

B&M LINEN CORP. D/B/A MIRON & SONS
LINEN SUPPLY A/K/A MIRON & SONS LINEN,
INC.,

Defendant.

07-CV-6999 (DLC)

**NOTICE OF MOTION
FOR
SUMMARY JUDGMENT**

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COUNSEL:

PLEASE TAKE NOTICE, that upon the annexed Declaration of Elizabeth M. Pilecki, dated March 20, 2008, Declaration of Jeffrey Warbet, dated March 20, 2008, the exhibits annexed thereto, Plaintiffs' Rule 56.1 Statement, the accompanying Memorandum of Law and upon all prior pleadings and proceedings, the undersigned will move this Court before the Hon. Denise L. Cote, United States District Judge, United States District Courthouse, located at 500 Pearl Street, New York, New York, for an Order for Summary Judgment in Plaintiffs' favor and against Defendant.

Grounds for this Motion are set forth fully in Plaintiffs' Memorandum of Law.

WHEREFORE, Plaintiffs respectfully request this Court enter an Order granting
Summary Judgment in Plaintiffs' favor and against Defendants.

Dated: New York, New York
March 21, 2008

KENNEDY JENNIK & MURRAY, P.C.

By: 

Elizabeth M. Pilecki (EP-5805)
113 University Place, 7th Floor
New York, New York 10003
(212) 358-1500